DEPARTMENT OF THE ARMY
Holston Army Ammunition Plant
4509 West Stone Drive
Kingsport, TN 37660

13 August 2015

REPLY TO
ATTENTION OF

Mr. Quincy Styke III
Deputy Director
Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

Mr. Styke,

Pursuant to my email of July 31, 2015, I have communicated with the Army Commander at Radford Army Ammunition Plant (RFAAP), Radford, VA, specific to RFAAPs incineration design project and reduction, not cessation of open burning. RFAAP has been utilizing incineration for disposal of their propellant production waste since the 1940s. Their new incinerator design project is to replace both of the existing incinerators. The project has been funded by the Army and is in the design phase at this time. After the design has been finalized and accepted by the Army a contract will be initiated for the construction of the incinerator. It will be several years before this new incinerator is in operation at RFAAFP. The Army and BAE staff's at Holston Army Ammunition Plant (HSAAP) and RFAAP will keep each other informed on the status of the project through construction. Incineration as a technology, to include the RFAAP design, will be examined for possible use to reduce HSAAP open burning in HSAAPs project plan.

HSAAP initiated a project plan to evaluate alternate technologies to reduce and move away from open burning this fiscal year. Phase one of the four phase project was placed on contract with HSAAP operating contractor, BAE Systems, on June 30, 2015. Phase one titled, "Evaluation for Continuation of HSAAP Open Burning", is 12 months in duration and is to quantify the explosive wastes streams at HSAAP by performing waste characterization, Material Potentially Presenting an Explosive Hazard and determination of the amounts of materials currently being processed by open burning. The objective is to identify and ensure those explosive waste streams that cannot be thoroughly processed safely by any other method than through open burning as required by TDEC 1200-3-4.04 are only sent to the burning ground.

Phase two is to perform a technology review of treatment technologies for the quantified waste streams, evaluate material handling and safety requirements for each waste stream and treatment technology, and identify treatment costs. At this time, it is estimated phase two may be up to 18 months in duration.

Phase three will design selected technology system(s) and Phase four will be the construction phase for the down selected technology system(s). The duration of these phases will depend on the relative risk of implementing the technology(s) chosen into design solution(s). In conjunction with phase three will be an environmental impact analysis of the technology system(s) to identify required modifications to existing permits (NPDES, RCRA, Title V CAA, etc.) if not issuance of new permits prior to the construction phase.

Let me assure you that I clearly understand the citizen pressure upon TDEC and the EPA relative to reducing or eliminating HSAAP open burning. HSAAP has reduced our large open burns from four in 2013 to three in 2014, and down to two in 2015. We will continue to do everything we can in the short term while seeking alternate technology solutions.

Sincerely

Joseph R. Kennedy
Commander's Representative